



United States Environmental Protection Agency
Washington, DC 20460

Work Assignment Number

WA-1

Work Assignment

☐ Original ☒ Amendment Number: 2

Contract Number
EP-W-11-044

Contract Period
Base Option Period Number 1

Title of Work Assignment
Acquiring and Processing Data for Energy
Extraction Initiative

Contractor
EASTERN RESEARCH GROUP

Specify Section and Paragraph of Contract SOW
See attached SOW

Purpose: ☐ Work Assignment Initiation ☐ Work Assignment Close-Out
☒ Work Assignment Amendment ☐ Incremental Funding
☐ Work Plan Approval

Periods of Performance
From: 08/02/13 To: 06/05/15

Comments:

The purpose of this action is to increase the estimated level of effort ceiling by 160 hours at no cost to the agency.

☐ Superfund

Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

Authorized Work Assignment Ceiling

Contract Period: Cost/Fee LOE
Previously Approved \$104,867.00 522

This Action 160

Total \$104,867.00 682

Work Plan / Cost Estimate Approvals

Contractor WP Dated : Cost/Fee: LOE:

Cumulative Approved: 6/4/14 Cost/Fee: \$104,867 LOE: 682

Work Assignment Manager Name

CAREY JOHNSTON

Branch/Mail Code 2222A

Phone Number 202-564-1014

Fax Number 202-564-0031

(Signature)

(Date)

Project Officer Name

MICHAEL D. RICHARDSON

Branch/Mail Code 2221A

Phone Number 202-564-1508

Fax Number 202-564-0075

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Official Name

MICHAEL GILHAM

Branch/Mail Code 3803R

Phone Number 202-564-6090

Fax Number 202-565-2554

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

Acquiring and Processing Data for Energy Extraction Initiative

Contract: EP-W-11-044, Work Assignment: WA-1-9 Amendment: 0002

Summary Information

Title: Acquiring and Processing Data for Energy Extraction Initiative
Period of Performance: From: 08/02/13
To: 06/05/15

WA Classification

The following changes have occurred:

The Labor Hour Ceiling has changed from 522 to 682.



States Environmental Protection Agency
Washington, DC 20460

Work Assignment

Work Assignment Number

WA

☐ Original ☒ Amendment Number:

Contract Number
EP-W-11-044

Contract Period
Base Option Period Number 1

Title of Work Assignment
Acquiring and Processing Data for Energy
Extraction Initiative

Contractor
EASTERN RESEARCH GROUP

Specify Section and Paragraph of Contract SOW
See attached SOW

Purpose: ☐ Work Assignment Initiation ☐ Work Assignment Close-Out
☒ Work Assignment Amendment ☐ Incremental Funding
☒ Work Plan Approval

Periods of Performance

From: 08/02/13

To: 06/05/15

Comments:

This action approves the work plan dated 8/26/13.

☐ Superfund

Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

Authorized Work Assignment Ceiling

Contract Period:
Previously Approved

Cost/Fee

LOE
0

This Action

\$104,867.00

522

Total

\$104,867.00

522

Work Plan / Cost Estimate Approvals

Contractor WP Dated : 8/26/12

Cost/Fee: \$104,867

LOE: 522

Cumulative Approved:

Cost/Fee:

LOE:

Work Assignment Manager Name

CAREY JOHNSTON

(Signature)

(Date)

Branch/Mail Code 2222A

Phone Number 202-564-1014

Fax Number 202-564-0031

Project Officer Name

WILLIE GRIFFIN

(Signature)

(Date)

Branch/Mail Code 2248A

Phone Number 202-564-2077

Fax Number 202-564-0027

Other Agency Official Name

(Signature)

(Date)

Branch/Mail Code

Phone Number

Fax Number

Contracting Official Name

MICHAEL GILHAM

(Signature)

(Date)

Branch/Mail Code 3803R

Phone Number 202-564-6090

Fax Number 202-565-2554

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

Acquiring and Processing Data for Energy Extraction Initiative

Contract: EP-W-11-044, Work Assignment: WA-1-9

Summary Information

Title: Acquiring and Processing Data for Energy Extraction Initiative
Period of Performance: From: 08/02/13
To: 06/05/15

WA Totals

The following item(s) have been added:

Category	POP	
Estimated Cost	Option Pd. 1	\$ (b)(4)
Fixed Fee	Option Pd. 1	

WA Classification

The following changes have occurred:

The Labor Hour Ceiling has changed from 0 to 522.



United States Environmental Protection Agency
Washington, DC 20460

Work Assignment Number
1-9- Opt1

Work Assignment

☐ Original ☒ Amendment Number:

Contract Number
EPW-11-044

Contract Period
Option Period Number 1

Title of Work Assignment
Acquiring and Processing Data for Energy
Extraction Initiative

Contractor: ERG

Specify Section and Paragraph of Contract SOW
Section C

Purpose: ☒ Work Assignment Initiation ☐ Work Assignment Close-Out
☐ Work Assignment Amendment ☐ Incremental Funding
☐ Work Plan Approval

Periods of Performance
From: 8.2.13 To 8.5.15

Comments: To Approve the workplan dated August 26, 2013..

☐ Superfund

Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

Authorized Work Assignment Ceiling

Contract Period:	Cost/Fee	LOE
Previously Approved		
This Action	\$0.00	
Total		

Work Plan / Cost Estimate Approvals

Contractor WP Dated :	Cost/Fee:	LOE:
Cumulative Approved:	Cost/Fee:\$	LOE:
Work Assignment Manager Name Carey Johnson	Branch/Mail Code 2222A	
(Signature)	Phone Number 202 564-1014	
	Fax Number 202 564-0031	
Project Officer Name	Branch/Mail Code 2221-A	
Willie Griffin signed	Phone Number 202 564-2077	
(Signature)	Fax Number 202 564-0027	
Other Agency Official Name	Branch/Mail Code	
	Phone Number 202	
(Signature)	Fax Number 202	
Contracting Official Name Michael Gilham	Branch/Mail Code 3803R	
	Phone Number (202) 564-6090	
(Signature)	Fax Number 202 565-2554	

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

United States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

WA-1-9

☒ Original ☐ Amendment Number:Title of Work Assignment
Acquiring and Processing Data for Energy Extraction InitiativeContract Number
EP-W-11-044Contract Period
Base Option Period Number 1Contractor
EASTERN RESEARCH GROUPSpecify Section and Paragraph of Contract SOW
See attached SOWPurpose: ☒ Work Assignment Initiation ☐ Work Assignment Close-Out
☐ Work Assignment Amendment ☐ Incremental Funding
☐ Work Plan Approval

Periods of Performance

From: 08/02/13

To: 06/05/15

Comments:

Support for the Energy Extraction National Enforcement Initiative as detailed in the attached Statement of Work.

☐ Superfund**Accounting and Appropriations Data**☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

Authorized Work Assignment CeilingContract Period: Cost/Fee LOE
Previously Approved

This Action

Total

Work Plan / Cost Estimate Approvals

Contractor WP Dated : Cost/Fee: LOE:

Cumulative Approved: Cost/Fee: LOE:

Work Assignment Manager Name

CAREY JOHNSTON

Branch/Mail Code 2222A

Phone Number 202-564-1014

Fax Number 202-564-0031

(Signature)

(Date)

Project Officer Name

WILLIE GRIFFIN

Branch/Mail Code 2248A

Phone Number 202-564-2077

Fax Number 202-564-0027

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

Fax Number

(Signature)

(Date)

Contracting Official Name

MICHAEL GILHAM

Branch/Mail Code 3803R

Phone Number 202-564-6090

Fax Number 202-565-2554

(Signature)

(Date)

Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

Acquiring and Processing Data for Energy Extraction Initiative

Contract: EP-W-11-044, Work Assignment: WA-1-9

Summary Information

Title: Acquiring and Processing Data for Energy Extraction Initiative
Period of Performance: From: 08/02/13
To: 06/05/15

Procurement Management Roles

WORK ASSIGNMENT MANAGER:

U.S. E.P.A.

Attn: CAREY A. JOHNSTON

1200 PENNSYLVANIA AVE, NW

WASHINGTON, DC 20460

Mail Code: 2222A

Phone Number: 202-564-1014

Fax Number: 202-564-0031

E-Mail Address: johnston.carey@epa.gov

Attachments

Attachment Name

Acquiring and Processing Data for Energy Extraction Initiative SOW

**STATEMENT OF WORK
CONTRACT EP-W-11-044
WA-1-9**

1. **TITLE:** Acquiring and Processing Data for Energy Extraction Initiative
2. **PERIOD OF PERFORMANCE:** Date of Issuance through June 5, 2015.
3. **EPA Work Assignment Manager (WAM):**

Carey A. Johnston, P.E.
U.S. EPA/OECA/OC/ETDD (2222A)
William J. Clinton South, Room 6120
1200 Pennsylvania Ave., NW
Washington, DC 20460
Ph: 202-566-1014
E-mail: johnston.carey@epa.gov

4. **BACKGROUND**

EPA's Energy Extraction National Enforcement Initiative (Initiative) requires universe information on land-based gas and oil extraction facilities that are potentially subject to EPA actions (permitting, inspections, and enforcement). Facilities subject to this Initiative include land-based oil and gas extraction wells, compressor stations, and gas plants. Inspectors and managers need a comprehensive database of oil and gas facilities in order to conduct queries and mapping for targeting and results reporting. This database also can help EPA Regions prepare work plans and conduct end-of-year reporting. This work assignment (WA) outlines the tasks required for maintaining and updating this universe database for the Initiative and its related Knowledge Base and GeoPlatform.

EPA's national data systems of record (AFS, ICIS-NPDES/PCS, RCRAInfo) do not contain all the information needed to support the Initiative. In particular, these data systems do not collect enough facility-specific information to provide EPA inspectors and managers with the necessary data to conduct proper targeting and reporting. The fast growing nature of the oil and gas extraction sector also means that quarterly refreshes of the data are necessary to gain access to current and relevant data. In the past few years, EPA Regional and state staff have made extensive use of these data for inspections and enforcement targeting. This project also incorporates additional processing to enhance targeting (e.g., identification of wells in non-attainment areas or with sole source aquifers).

This WA provides the tasks required for maintaining and updating a universe database, which will separately be used to conduct queries and mapping for targeting and results reporting. This work assignment continues work done under a prior work assignment under this contract: WA #0-3.

This WA outlines the tasks for selecting data sources, purchasing data from commercial vendors, performing quality assurance checks, reviewing and transforming this data into useable formats, and documentation. The transformed oil and gas data will be used for EPA's "GeoPlatform" and "Knowledge Base," which are online resources available only to Online Tracking Information System (OTIS) users (EPA and state staff) and managed under a separate EPA contract.

5. PURPOSE AND OBJECTIVE

Under this WA the Contractor shall conduct quarterly updates to the "Energy Initiative Database" (database), which contains information on land-based facilities in the oil and gas extraction, distribution, and processing sectors. This database will be in an Oracle 11g compatible format. The Contractor shall also maintain the Oil and Gas Knowledge Base website and GeoPlatform webservice. With each quarterly data refresh the Contractor shall purchase and extract data from commercial data providers (e.g., *DrillingInfo* and *Oil and Gas Journal*) and Federal and state data (e.g., Federal Energy Regulatory Commission (FERC), National Emissions Inventory, Illinois and Indiana oil and gas data). The Contractor shall also prepare a Quality Assurance Project Plan (QAPP) that describes the database development and refresh process (including quality assurance measures). The Contractor shall process the data on a quarterly basis with the quality assurance measures outlined in the QAPP. For each data refresh the Contractor shall deliver a short summary memorandum that outlines the dates and other major details for each data refresh (including any updates to the QAPP). These quarterly summary memoranda shall also describe any significant changes observed in the data from the last refresh cycle. Finally, the Contractor shall develop a user guide on how inspectors might use and display the data in the database and conduct specialized queries for the Agency. This WA is estimated to require the purchase of four months total of access to *DrillingInfo* (one month of access for each quarterly update).

6. SCOPE OF WORK

Task 1 – Program Management

The Contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this WA. The work plan shall also include a list of the key personnel to participate in the WA. The Contractor shall also estimate other direct costs such as travel, computer cost, typing, etc.

The Contractor shall provide electronic copies of the monthly progress reports to the EPA WAM and Project Officer (PO). Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports shall also identify any problems or difficulties.

In addition to the monthly progress reports, the Contractor shall prepare monthly status summaries (in a Microsoft Excel compatible format) to the EPA WAM and PO. The WAM will provide the template for these monthly and mid-monthly status summaries. The monthly status reports shall list the following information by task: summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and LOE expenditures shall be provided prior to the progress report. The Contractor shall obtain written permission from the EPA WAM prior to any release of the data collected in this Work Assignment.

TASK 1 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Work Plan	• 25 days from issuance of work assignment
Progress Reports and Status Summaries	• Monthly

Task 2 – Quality Assurance

This task includes developing a Quality Assurance Project Plan (QAPP) that shall document how quality

assurance and quality control will be applied to the development of the database. The Office of Enforcement and Compliance Assurance (OECA) will use the QAPP to demonstrate compliance with EPA's quality system requirements set forth in EPA Order 5360.1 and EPA "Requirements for Quality Assurance Project Plans," EPA QAIG-5, December 2002. In particular, it is the policy of OECA that QA activities shall be conducted to assure environmental data generated, processed, or used for its program requirements will be of known quality, and will achieve prescribed data quality objectives. Furthermore, the data shall be adequate and sufficient for its intended use. The updated QAPP shall include:

- a description of how the energy initiative data will be generated, compiled, and organized by the Contractor;
- a description of how the Contractor will evaluate the energy initiative data for completeness, reasonableness, and comparability; verify that any calculations are correct; and test and evaluate the database performance;
- a description of the process for transferring the data to EPA or EPA contractors;
- documentation of select logic from the data sources, and pull/refresh dates;
- documentation of any known data limitations with the sources of data; and
- an appendix which will serve as the data element dictionary for the database.

In summary, the QAPP should clearly state: (1) the source of data, (2) how the Contractor collects the data, (3) the frequency of data refresh, (4) data reformatting and processing (e.g., error corrections, unit conversions), and (5) any limitations or descriptive information that should be displayed to the EPA's Knowledge Base users.

TASK 2 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Quality Assurance Project Plan	• 4 weeks from issuance of work assignment
Revised Updated Quality Assurance Project Plan	• 2 weeks after receipt of comments from EPA

Task 3 – Database Refresh and Delivery

Under this task the Contractor shall purchase the needed universe data and conduct quarterly updates to the database. As noted above, for each quarterly data refresh, the Contractor shall extract data from the relevant commercial, Federal, and state data providers. The Contractor shall use the QAPP created under Task 2, along with the procedures developed by the Contractor under prior WA #0-3, to conduct these quarterly data refreshes.

DrillingInfo: States collect data on oil and gas extraction activities in order to collect royalties and taxes and manage their state resources; this now includes data on rig locations. These functions are often performed by the state oil and gas conservation commission, which is usually not part of the state environmental agency. This data is not generally submitted to EPA. The mission of these state commissions is to foster, encourage, and promote the development, production, and utilization of their natural resources of oil and gas. The data kept by each commission is managed in separate databases and there is no single national standard for managing this type of data. *DrillingInfo* has created a single national database on oil and gas extraction activities from these separate databases. The Contractor shall also obtain data from state oil and gas conservation commissions (e.g., Illinois, Indiana) when such data are not available through *DrillingInfo*.

Oil and Gas Journal Worldwide Gas Processing Survey (O&GJ Survey): The Contractor shall also

purchase data from O&GJ to update the operator, location, and capacity of gas processing plants. O&GJ sends surveys to all oil and gas companies annually to obtain updated information on their gas processing plants. O&GJ publishes its survey in June every year, with capacities based on January 1 of that year (i.e., the January 1, 2010 capacity is published in June 2010). The Contractor shall also incorporate data from EPA and state staff that have information on gas processing plants that are not in the O&GJ Survey.

FERC: the Contractor also shall use FERC data to identify the operator, location, and capacity of natural gas compressor stations. These data include:

- Form 2: Annual Report of Major Natural Gas Companies; and
- Form 2-A: Annual Report of Non-Major Natural Gas Companies.

The Contractor shall also incorporate data from EPA and state staff that have information on natural gas compressor stations that are not in the FERC data.

Finally, the Contractor shall purchase or use additional data sources to allow for a more complete universe and for targeting of compressor station expansions, including:

- Oil and Gas Journal Worldwide Pipeline Construction Survey, which includes: company, type of project (e.g., crude, gas, compressor station, gas storage, etc.), status of the project (e.g., planning, engineering, construction, etc.), expected completion date, and project notes that may include capacity.
- EPA's National Emission Inventory (NEI) Database, which includes criteria and hazardous air pollutants.
- State data (e.g., IN, IL, PA DEP data).

The Contractor shall deliver the database to EPA on a quarterly schedule and provide technical support on integrating this data with the Knowledge Base. The terms of service for this purchased data shall allow the Contractor to share the database with EPA and for the Agency to share the database with its contractors and OTIS users.

The Contractor shall also update and maintain the Oil and Gas Knowledge Base and webservices feeding the EPA GeoPlatform (e.g., WellsTopTen2013 service - <http://igeo.epa.gov/ArcGIS/rest/services/OECA/WellsTopTen2013/MapServer>). In particular, the Contractor shall update and expand these services to provide more details on the current and most recent location of oil and gas drilling rigs. For example, the Contractor shall develop a webservice for the GeoPlatform showing the location and attributes for oil and gas drilling rigs.

TASK 3 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Energy Initiative Database ("Database") Refresh and Maintenance of Oil and Gas Knowledge Base and webservice feeding the EPA GeoPlatform	• 90 days after work assignment issuance and quarterly thereafter (4 refreshes total over one year)
Support for deployment of the database on EPA's Knowledge Base	• At Written Technical Direction from the WAM

Task 4 – Database Refresh Documentation

With each quarterly data refresh the Contractor shall deliver a short summary memorandum (e.g., five to ten pages) that outlines the dates and other major details for each data refresh (including any updates to the QAPP and explanations for any significant changes to the data). These quarterly summary memoranda shall also describe any significant changes observed in the data from the last refresh cycle.

The Contractor shall develop a user guide on how inspectors might use and display the data in the database. This user guide shall be written in a plain language format (see Appendix A) and include screen shots of example queries, data displays, and potential integration with free online tools (e.g., Google Maps).

Finally, the Contractor shall support the Agency in running specialized queries. The WAM will identify the search terms and the data fields for the output in a CSV file. For planning purposes, the Contractor should estimate that there will be ten such specialized ad-hoc queries. The Contractor shall work with the EPA WAM to develop an ad-hoc basis reporting form users complete, dynamically, within the Oil and Gas Knowledgebase. The Contractor shall also develop and deploy a standard report that the Contractor shall produce per written direction of the WAM. The Contractor shall also develop and retain a short summary memorandum (e.g., half to one page) that outlines the dates, limitations, and other pertinent details for each ad-hoc query requested by the EPA WAM.

TASK 4 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Quarterly Summary Data Refresh Memorandum	• 90 days after work assignment issuance and quarterly thereafter (4 total)
Database User Guide	• 120 days after work assignment issuance
Specialized Database Queries (10)	• At Written Technical Direction from the WAM

7. **CONTRACT SOW REFERENCE:** Task Areas II.4 -6; and III 2.a

8. ANTICIPATED TRAVEL REQUIREMENTS

EPA does not anticipate the need for non-local travel by contractor employees and/or subcontractors to support the scope of this WA.

9. ADDITIONAL CONTROL REQUIREMENTS

- a. Other direct costs (ODCs). Other direct costs for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this WA without the prior written approval of the Contracting Officer.
- b. Recordkeeping. Upon issuance of written technical direction (TD), the Contractor shall submit for inspection all work in progress at any time under this WA. The Contractor shall develop and maintain files supporting each task.
- c. Resolution of Identified Problems. The Contractor shall contact the Contracting Officer (CO) and/or the Project Officer (PO) by telephone to discuss any problems that may adversely affect the work on this WA. Within five (5) calendar days the contractor shall follow the phone call with a brief written

explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.

- d. Notification of Spending. The Contractor shall notify the CO and EPA WAM in writing when 75% of the authorized work assignment LOE/labor hours have been expended.
- e. Contractor Identification. To avoid any perception that contractor personnel are EPA employees, the Contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites. When speaking with the public the Contractor should refer all interpretations of policy to the EPA WAM.
- f. Limitation of Contractor Activities. The Contractor shall submit drafts of all deliverables to the EPA WAM for review prior to submission of the final product. The Contractor shall incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. The Contractor shall adhere to all applicable EPA management control procedures as implemented by the EPA CO, PO, and WAM.
- g. Deliverable Formatting and Terminology. Throughout this WA, the Contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The EPA WAM and Contractor will use the terminology in this WA to improve the deliverable review process (see Attachment A). The Contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA WAM prior to file preparation.
- h. Deliverables. Major technical reports shall be subject to internal Contractor peer review by an expert(s) not directly involved in the mainstream WA tasks. Deliverables shall be prepared with proper adherence to EPA style and format requirements. See Attachment A.
- i. Deadlines. For the purpose of developing this work plan, the Contractor shall assume the deliverable due dates provided with each task. The EPA WAM/PO will use written technical direction to change a deadline if management requires any particular deliverable earlier than the date specified. For any deliverable, no deadline will extend beyond the WA period of performance.
- j. Organizational Conflict of Interest. The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest - as defined in FAR Subpart 9.5 - or that the Contractor has disclosed all such relevant information. See contract clause H.3 Organizational Conflict of Interest.
- k. Notification of Conflicts of Interest Regarding Personnel. The Contractor shall immediately notify the PO and the CO of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract; or (2) any such conflicts concerning subcontractor employees or consultants working on, or having access to information regarding, the contract when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See contract clause H.4.
- l. Enforcement Sensitive Information. This work assignment will not likely involve enforcement sensitive information. In the event that EPA does require the Contractor to handle enforcement sensitive information, the Contractor recognizes that this information should not be released to the public without EPA approval. Enforcement Sensitive refers to records or information compiled for

law enforcement purposes (whether administrative, civil, or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all Contractor personnel including, but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or WA - or with access to materials developed pursuant to such efforts - understand that this information is confidential and any disclosure or misuse of such information may result in prosecution to the fullest extent of the law. All Contractor personnel are expected to exercise due diligence in safeguarding, handling, and disposing of any such information.

- m. Handling of Confidential Business Information (CBI). The Contractor is prohibited from accepting or handling CBI under this WA. EPA does not anticipate the need for the Contractor to handle CBI for this WA, as all of the data collected in this scope of work are not claimed as CBI.

Attachment A – Improving the Deliverable Review Process

This Work Assignment involves the production of several types of written products ranging from deliberative memos to published reports. The general workflow is for EPA to provide written guidance to the Contractor on the development of these products. The Contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The EPA WAM and Contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a Contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the Contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the Contractor, and other stakeholders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (e.g., an internal contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

First Draft – An early version of a document that will ultimately be “public-ready”. The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review (STR), particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is not unreasonable to expect that STR results in further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A “public-ready” document that is ready for distribution to an internal audience (e.g., EPA workgroup) or external audience (e.g., EPA's Docket). The Contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to write in plain language. Specifically, the technical editor will revise the document to address the following questions.¹

¹ These questions were modified from the following EPA's website: <http://www.epa.gov/plainlanguage/faqs.htm>

- ❖ Is the document organized to serve the needs of readers?
- ❖ Does the document explain how it is organized and how to use it?
- ❖ Does the document start with items of most interest to reader?
- ❖ Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- ❖ Are complicated topics summarized before describing all the details?
- ❖ Does the document use the active voice?
- ❖ Does the document include only information readers actually need?
- ❖ Does the document use easy-to-read design features like lists, tables, graphics, and "white space"?
- ❖ Are citations for references clearly identified and does the reader know how to gain access to these references?

Additionally, the Contractor shall get approval from EPA on any other style sheets for Draft Final documents.

Clarification of EPA's Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when STR should take place and the purpose of the STR. Specifically, EPA should identify for the Contractor the "big-picture" objectives and questions for the STR to address. The STR should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The contractor shall share with EPA a summary of the STR.